



CERTIFICATION

This is to certify that **CHIYODA PHILIPPINES CORPORATION (CPh)** at the Sun Plaza, is a PEZA-registered Ecozone IT (Export) Enterprise with Registration Certificate No. 09-96-IT dated 22 December 2009.

This is to further certify that **CPh** is a qualified enterprise for the purpose of VAT zero-rating of its transactions with its local suppliers of goods, properties and services in connection with its PEZA-registered activities, in accordance with Section 4.106-6 and 4.108-6 of Revenue Regulations No. 16-2005, the Consolidated Value-Added Tax Regulations 2005. The VAT Zero rating also applies to **CPh's** transaction with its local suppliers of goods, properties and services for **CPh's** rendering of IT-enabled Engineering, Procurement and Construction (EPC) services to Taganito HPAL Nickel Corporation (THPAL), a PEZA-registered Ecozone Export Enterprise with Registration Certificate No. 10-02 dated 07 January 2010, located at the Taganito-SEZ in Claver, Surigao del Norte, through and as member of its unincorporated joint venture ("TJCP JV") with JGC Philippines, Inc., also a PEZA-registered Ecozone IT (Export) enterprise with Registration Certificate No. 07-14-IT dated 27 February 2007. "TJCP Joint Venture", is registered with the BIR for "architectural, engineering activities, technical consultancy" under Registration No. 9RC000278715 dated 07 May 2010.

Pursuant to BIR's Revenue Memorandum No. 25-99 dated 18 March 1999, sales of automobiles to registered Ecozone Enterprises, including PEZA-registered enterprises, are not entitled to VAT zero-rating.

This certification is issued upon the request of **CPh** for whatever legal purpose it may serve, and is valid for the year 2018, unless otherwise revoked or suspended by PEZA prior to expiration of said period. Further, this certification is automatically revoked in the event of cancellation of **CPh's** PEZA registration, effective on the date of said cancellation.

MARY HARRIET O. ABORDO
Deputy Director General for Operations

18 December 2017

cvc/ntp

PEZA VAT CERTIFICATE



2018-0538